

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re)
) **Chapter 11**
SEARS HOLDINGS CORPORATION, et al.,)
) **Case No. 18-23538 (RDD)**
)
Debtors.)
)

CURE OBJECTION OF COUNTERPARTY ROBERTSON HEATING SUPPLY

Counterparty, Robertson Heating Supply, pursuant to the Notice of Assumption and Assignment in Connection with Sale of Sears Home Improvement Business [Doc. 901], hereby files its objection to the Debtors' calculation of Cure Costs, on the basis that the schedule of Designation Rights Contracts, attached to the aforementioned Notice as Exhibit "B", is incomplete as it relates to Robertson Heating Supply and does not include all amounts owed to Counterparty Robertson Heating Supply Co.

As grounds for its Objection, Counterparty Robertson Heating Supply Co., states that the schedule of Designation Rights Contracts, attached to the Notice [Doc 901] as Exhibit "B", identifies the following purchase orders between Debtors and Counterparty Robertson Heating Supply:

Line	Name of Counterparty	Contract	Inv. Number	Proposed Cure Amt.
91	Robertson Heating Supply	PO	24602983A - 01A317344	\$899.78
92	Robertson Heating Supply	PO	24346471A - 01A317200	\$1,994.29
93	Robertson Heating Supply	PO	24493413A - 08Y146838	\$1,075.87
94	Robertson Heating Supply	PO	24426316A - 01A316671	\$700.88
95	Robertson Heating Supply	PO	24233718A - 08Y146770	\$1,372.01
96	Robertson Heating Supply	PO	8999078A - 558700100	\$508.66

However, the schedule of Designation Rights Contracts fails to include the following purchase orders also between Debtors and Counterparty Robertson Heating Supply, pursuant to

which Robertson Heating Supply has provided items of value to Debtors but for which it has not been paid:

Inv. Number	Open Invoice Amt.
01A319225	\$1,503.58
01A319584	\$1,305.17
01A319975	\$474.63
01A320543	<u>\$50.53</u>
	\$3,333.91

These additional purchase orders are attached hereto as Exhibit "A".

Therefore, Counterparty, Robertson Heating Supply, respectfully requests that Debtors' calculation of Cure Costs include the aforementioned invoices attached hereto as Exhibit "A" in addition to the Cure Costs initially included with Debtors' Notice [Doc. 901].

Respectfully submitted,

/s/Justin M. Alaburda
Justin M. Alaburda (#0082139)
BRENNAN, MANNA & DIAMOND, LLC
75 E. Market Street
Akron, Ohio 44308
Telephone: (330) 253-5060
Facsimile: (330) 253-1977
Email: jmalaburda@bmdllc.com
Counsel for Counterparty
Robertson Heating Supply

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2018, a true and accurate copy of the foregoing was electronically filed with the Court using the CM/ECF system, which will send a notification of such filing to all counsel of record. In addition, the following have been served by regular U.S.

Mail:

Sears Holding Corporation
Attn: Stephen Sitley and Luke Valentino
3333 Beverly Road
Hoffman Estates, IL 60179

Ray Schrock
Jacqueline Marcus
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153

Brandon Aebersold
Levi Quaintance
Lazard Freres & Co., LLC
30 Rockefeller Plaza
New York, NY 10112

Aaron Rigby
Sidley Austin LLP
2021 McKinney Avenue, Suite 2000
Dallas, TX 75201

s/ Justin M. Alaburda
Justin M. Alaburda